



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:
WU-16J

AUG 29 2013

CERTIFIED MAIL 7009 1680 0000 7674 5345
RETURN RECEIPT REQUESTED

Mr. Scott McDonald
Project Manager
Archer Daniels Midland Company
4666 Faries Parkway
Decatur, Illinois 62526

Subject: Request for Information Regarding Archer Daniels Midland (ADM) Financial Assurance for the CCS Wells.

Dear Mr. McDonald:

Pursuant to 40 CFR 146.82(a) (14), please submit estimates of the costs to perform the activities for which financial responsibility must be maintained at the CCS project. Please submit separate estimates for a third-party to complete the following activities:

- Post-Injection Site Care and Site Closure, considering the length of the post-injection timeframe, the frequency and type of monitoring that will be performed and the depth, diameter, and number of monitoring wells that will need to be plugged.
- Emergency and Remedial Response, considering how any impacts to the resources identified in Appendix H would be addressed.

Since ADM plans to use a corporate guarantee, we request the following information to support an evaluation of this proposed instrument:

- A signed letter by the CFO of the parent company guaranteeing that the company meets the financial coverage criteria in the Class VI Rule at 40 CFR 146.85.
- A copy of the independently certified report of the company's financial statements showing that the company meets the above financial coverage criteria.
- Financial information (certified by an independent auditor) that provides proof that the company meets the five financial ratios described at 40 CFR 146.58(a)(6)(v)

- Results of a bond rating test, i.e., obtained online through Moody's or S&P, that meet the minimum requirements of the bond rating test.

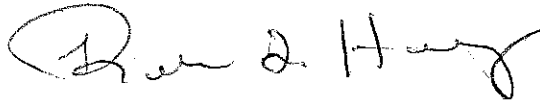
Also, is ADM using self insurance to cover other financial responsibility liabilities (e.g., through UIC, CERCLA, and/or RCRA)?

Additional information about financial responsibility instruments and developing cost estimates, including a more complete list of costs to consider, is presented in the Class VI Financial Responsibility Guidance available at

<http://water.epa.gov/type/groundwater/uic/class6/gsguidedoc.cfm>. Example text for the CFO letter and corporate guarantee, along with a calculation worksheet for the ratios/tests, is provided in Appendix B of the guidance.

Inquiries concerning the contents of this letter may be directed to Dana Rzeznik of my staff by telephone at (312) 353-6492 or by email to rzeznik.dana@epa.gov.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Rebecca Harvey", written over a horizontal line.

Rebecca Harvey, Chief
Underground Injection Control Branch

cc: Mark Burau, ADM, with enclosure
Stephen Nightingale, IEPA

Enclosure